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6 Attorney for Defendant

7 UNITED STATES DISTRICT COURT
8 NORTHERN DISTRICT OF CALIFORNIA
9 OAKLAND DIVISION

10 UNITED STATES OF AMERICA

11 v.

12 SHAVONN GRIFFIN,

13 Defendant.

) No. [4:13-cr-00028-CW-11](#)

)
)
) **STIPULATED REQUEST TO**
) **ALLOW DEFENDANT TO TRAVEL**
) **TO THE EASTERN DISTRICT AS**
) **PART OF HER CONDITION OF**
) **RELEASE**

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17 On January 16, 2013, the defendant Shavonn Griffin was ordered not to travel outside the
18 Northern District of California as a condition of her pretrial release. Ms. Griffin's mother resides
19 in Stockton, California which is located outside the Northern District's borders. Ms. Griffin's
20 mother is terminally ill and Ms. Griffin is a caregiver for her. Ms. Griffin seeks to travel to
21 Stockton, California for these family obligations and seeks the Court's permission. The parties
22 and Pretrial Services, with the Court's acquiescence, stipulate that Ms. Griffin may travel outside
23 the Northern District to attend these family obligations in Stockton with Pretrial Services
24 preapproval. Accordingly, the parties and Pretrial Services request this Court to amend Ms.
25 Griffin's conditions of release to allow for her travel to Stockton, California with the preapproval
26 of Pretrial Services. Respectfully submitted.

27 DATED: January 17, 2013

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PETER A. FITZPATRICK
Counsel for Defendant Shavonn Griffin

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DATED: January 17, 2013

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Kevin Barry
Trial Attorney